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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA** 2:21-cr-00004-RFB-DJA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 HUMBERTO GUZMAN-VIRGEN,
15 Defendant.

Case No. 2:20-mj-00924-BNW USA

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
18 Trutanich, United States Attorney, and Jared Grimmer, Assistant United States Attorney,
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
20 and Andrew Wong, Assistant Federal Public Defender, counsel for Humberto Guzman-Virgen,
21 that the Preliminary Hearing currently scheduled on January 22, 2021 at 8:30 am, be vacated
22 and continued to a date and time convenient to the Court, but no sooner than sixty (60) days.

23 This Stipulation is entered into for the following reasons:

24 1. The parties have resolved this matter and are awaiting a change of plea and
25 sentencing date before the district court.
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2. In order to allow an efficient resolution to this matter, the parties request the preliminary hearing be continued beyond the date of the anticipated change of plea and sentencing.

3. Defendant is incarcerated and does not object to a continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

This is the second request for continuance filed herein.

DATED this 15th day of January, 2021.

RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Andrew Wong
By _____
ANDREW WONG
Assistant Federal Public Defender

/s/ Jared Grimmer
By _____
JARED GRIMMER
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4 Plaintiff,

5 v.

6 HUMBERTO GUZMAN-VIRGEN,
7 Defendant.
8

Case No. 2:20-mj-00924-BNW USA

ORDER

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
12 January 22, 2021 at the hour of 8:30 a.m., be vacated and continued to March 18, 2021,
13 at 2:00 PM.

14 DATED this 15th day of January, 2021.

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17 UNITED STATES MAGISTRATE JUDGE
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